

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

EDWARD S. ADAMS,  
Defendant.

17-CR-64-DWF-KMM

**DEFENDANT’S MOTION TO  
SEAL DOCUMENTS FILED  
UNDER TEMPORARY SEAL**

Defendant Edward Adams in the above-captioned action has filed under temporary seal the following exhibits to the Supplemental Declaration of Gloria K. Maier, each of which collects numerous documents that Mr. Adams contends are outside the scope of the Yahoo! search warrant:

- Exhibit 2: Non-privileged documents viewed and “seized” by the government that relate to Mr. Adams’s personal and family matters and that are entirely unrelated to the issues described in either the warrant application or the superseding indictment.
- Exhibit 3: Non-privileged documents viewed and “seized” by the government that relate to Mr. Adams’s other business ventures and that are also entirely unrelated to the issues described in either the warrant application or the superseding indictment.
- Exhibit 4: Non-privileged documents viewed and “seized” by the government that relate to Apollo or Scio but that are entirely unrelated to the issues described in either the warrant application or the superseding indictment.
- Exhibit 5: Non-privileged documents viewed and “seized” by the government that relate to the sale of Apollo warrants or allegedly secret bank accounts but that are entirely unrelated to the issues described in the warrant application.

- Exhibit 6: Non-privileged documents viewed and “seized” by the government that relate to Mr. Adams’s personal tax returns or personal finances.
- Exhibit 7: Additional documents that appear to be outside the scope of the warrant for other reasons.
- Exhibit 8: Documents printed by Inspector Kroells directly from the Yahoo! thumb drive.
- Exhibit 9: Documents used by the government during witness interviews.

Defendant brings this motion pursuant to LR 49.1(d)(1)(A) to seal because the above-listed exhibits contain more than 1,600 documents that should not be exposed to public view for several reasons. First, these documents are riddled with personal proprietary information about Mr. Adams, his family, his business ventures, his finances, his health, and more. Second, as Mr. Adams argues in his Post-Hearing Brief in Support of Mr. Adams’s Motion to Suppress, these documents do not fall within the scope of the warrant in this case, so their only relevance to this litigation is that they should never have been seized by the government. It would be perverse if Mr. Adams had to expose his private information to the public in order to litigate a motion contending that information should never have been exposed in the first place.<sup>1</sup> Third, Mr. Adams is unable to redact the great mass of sensitive information contained in these documents because doing so would defeat the purpose of filing the documents with the Court to demonstrate their lack of relationship with the warrant, in part based

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<sup>1</sup> Mr. Adams does not, however, object to the government reviewing these documents for the limited purpose of responding to Mr. Adams’s Motion to Suppress. Accordingly, he requests that the Exhibits be sealed from the public but not the government.

on the extraneous personal information contained therein. Mr. Adams therefore requests that Exhibits 2, 3, 4, 5, 6, 7, 8, and 9 to the Supplemental Declaration of Gloria K. Maier be placed under seal indefinitely.

Dated: June 1, 2018

Respectfully submitted,

/s/ Gloria K. Maier

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